

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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COLLEEN O'DONNELL,)
Plaintiff,) U.S. DISTRICT COURT
v.) DISTRICT OF MASS.
JOHN ASHCROFT, ATTORNEY) Civil Action No: 04-40190-FDS
GENERAL, U.S. DEPARTMENT)
OF JUSTICE,)
Defendant.)

PROPOSED SCHEDULING ORDER

Defendant in this action submits the following Proposed Scheduling Order pursuant to Local Rule 16.1 and the Court's Order.

1. **Initial Disclosures:** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) must be completed by March 29, 2005.
2. **Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after May 16, 2005;
3. **Fact Discovery - Interim Deadlines.**
 - a. All requests for production of documents and interrogatories must be served by August 15, 2005.
 - b. All requests for admissions must be served by August 15, 2005.
 - c. All depositions, other than expert depositions,

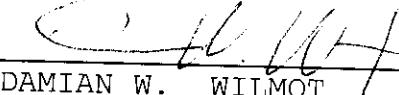
must be completed by November 15, 2005.

4. **Fact Discovery - Final Deadline.** All discovery, other than expert discovery, must be completed by December 15, 2005.
5. **Status Conference.** A status conference will be held on October 17, 2005.
6. **Expert Discovery.**
 - a. Plaintiff's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by June 15, 2005.
 - b. Plaintiff's trial experts must be deposed by November 15, 2005.
 - c. Defendant's trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by August 15, 2005.
 - d. Defendant's trial experts must be deposed by November 15, 2005.
7. **Dispositive Motions.**
 - a. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by January 16, 2006.
 - b. Oppositions to dispositive motions must be filed within 20 days after service of the motion.

8. **Pretrial Conference.** A pretrial conference will be held after decisions are rendered on motions for summary judgment.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: 

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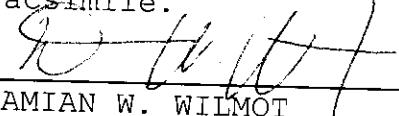
Dated: March 15, 2005

CERTIFICATE OF SERVICE

Suffolk, ss.

Boston, Massachusetts
March 15, 2005

I certify that on March 15, 2005, I caused a copy of the foregoing document to be served on Plaintiff's Attorney, Dawn McDonald, Cooley, Shrair, P.C., 1380 Main Street, 5th Floor, Springfield, MA 01103, by hand and facsimile.


DAMIAN W. WILMOT
Assistant U.S. Attorney